Case: 2:25-mj-00057-CMV Doc #: 1-1 Filed: 02/05/25 Page: 1 of 4 PAGEID #: 2

AO 91 (Rev. 11/11) Criminal Complaint

ATTACHMENT A

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

- I, Terrence Vollmer, (hereafter referred to as the affiant) being duly sworn depose and state:
- 1. I am currently employed as a Sergeant for the Ohio State Highway Patrol, currently assigned full-time as a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Columbus Group I Office, Central Ohio Crime Gun Intelligence Center (CGIC). As such, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18 U.S.C.§ 2510(7), that is, and officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in Title 18 U.S.C.§ 2516. Your affiant is empowered to investigate, to make arrests with or without warrants and to execute search warrants under the authority of Title 21 U.S.C.§ 878 and the Ohio Revised Code. Your affiant has been employed with the Ohio State Highway Patrol since December 2004.
- 2. Prior to being assigned to the ATF and CGIC, your affiant was a Trooper and is a Sergeant with the Ohio State Highway Patrol, formally being assigned to the Wilmington Post, Circleville Post, Chillicothe Post, and to the Training Academy. Your affiant completed the Ohio State Highway Patrol Academy training in June, 2005. As an ATF Task Force Officer, I have participated in investigations and successful prosecution of individuals and organizations involving violent street gangs, firearms traffickers, and firearm-related crimes.
- 3. The information outlined below does not contain all details or all facts of which I am aware relating to this investigation but rather is provided for the limited purpose of establishing probable cause that Michael Stanley MORRIS III committed this offense.

FACTS SUPPORTING PROBABLE CAUSE

- 4. On September 3, 2024, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Investigators identified Michael S. MORRIS III (DOB: 10/1/2000) as a suspect warranting further investigation. MORRIS is a prohibited person who was identified as a suspect in a felonious assault in the city of Columbus. MORRIS has an active felonious assault warrant for his arrest through Franklin County Municipal Court (2024 CR A 014410).
- 5. On or about August 29, 2024, at approximately 1359 hours, the Columbus Division of Police (CPD) Officers responded to the residence of 2786 Citizens Place, Apartment B, in the city of Columbus, on the report of a domestic violence incident (NIBIN Enforcement Support System Informational Report IR773001127). Upon arrival, a victim and two witnesses notified CPD officers MORRIS and Karly Jordan arrived at the residence to remove MORRIS's belongings from the residence. The victim and Jordan began to fight in front of the apartment complex. MORRIS removed a firearm from his person and struck the victim in the head numerous times. MORRIS then fired the firearm into the asphalt to stop the fight. MORRIS and Jordan then fled the scene. The fired shell casing was collected and entered into the National Integrated Ballistic Information Network (NIBIN). The casing matched Crime Gun 773-23-005615.

6. Crime Gun 773-23-005615 NIBIN events

- a. First event January 2, 2022, felonious assault Officers were responding to a shot spotter alert at 478 E. Morrill Avenue, Columbus, Ohio, when the report of a shooting came in shortly afterwards. Officers arrived to find the victim on the sidewalk with a gunshot wound to the upper part of his left arm. Victim could not give any suspect information. Victim was transported to the hospital in stable condition. Victim crashed into multiple vehicles after being shot and attempting to flee.
- b. Second event November 30, 2023, discharging firearms On the listed date at 1184 E. 12th Avenue, Columbus, Ohio, officers located five (5) casings in front of the location where the shot spotter came in. Officers interviewed the caller and two individuals who claimed to have nothing to do with it. Officers turned the casings into the property room.
- c. Third event August 29, 2024, domestic violence CPD Officers responded to 2786 Citizens Place, Columbus, Ohio. Upon arrival, a victim and two witnesses notified CPD officers MORRIS and Karly Jordan arrived at the residence to remove MORRIS's belongings from the residence. The victim and Jordan began to fight in front of the apartment complex. MORRIS removed a firearm from his person and struck the victim in the head numerous times. MORRIS then fired the firearm into the asphalt to stop the fight. MORRIS and Jordan then fled the scene.
- 7. Your Affiant conducted a query of the National Crime Information Center (NCIC) and Franklin County Clerk of Courts website and located the following felony convictions for MORRIS.
 - a. 20CR3886 Discharge of a firearm over a Public Roadway, 3rd degree felony.
- 8. Your Affiant recognizes that MORRIS is currently prohibited from possessing a firearm pursuant to Title 18 United States Code § 922(g)(1).
- 9. On September 5, 2024, your Affiant obtained information from the Ohio Bureau of Motor Vehicles that MORRIS provided the cell phone number of 614-942-8108 on August 9, 2024. Your Affiant learned the target phone number carrier service was provided by Sinch Voice. Your Affiant sought a state search warrant to conduct a cell phone ping on the target phone number. On September 6, 2024, Franklin County Common Pleas Judge Bill Sperlazza found probable cause and signed the search warrant. The search warrant was submitted to Sinch Voice electronically on that same date.
- 10. On September 9, 2024, your Affiant obtained information from Sinch Voice pertaining to the target phone number of 614-942-8108, associated with Michael MORRIS. Sinch Voice is a Voice over Internet Protocol (VoIP) company and does not provide the cellular service for the "customer". An internet service provider (ISP) number was provided in the records provided by Sinch Voice. A search of the ISP revealed it belongs to Charter Communications, Inc. An investigative subpoena was sought for the physical address for the ISP. On September 13, 2024, Franklin County Municipal Court Judge Andrea Peeples signed the investigative subpoena. The subpoena was submitted to Charter Communications electronically.
- 11. On September 13, 2024, your Affiant received a response from Charter Communications involving the internet protocol (IP) address 174.105.134.175. Charter Communications advised the service is provided to Mykayla Jackson at 2786 Citizens Place, Apartment B., Columbus, Ohio 43232. Ms. Jackson was the victim of Columbus Division of Police incident 240641025, involving MORRIS.

- 12. On September 24, 2024, the Columbus Division of Police (CPD) officers responded to 317 S. Highland Avenue, Columbus, Ohio, 43223, at 0905 hours on the report of several shots being fired from a firearm (CPD report 240713400). When officers arrived, they noticed several shots had struck the front of the residence. Twenty-one (21) spent shell casings were located on the street and two (2) spent were located inside the front door of the residence. There were no reported injuries or witnesses involving this incident. The spent shell casings were submitted to the CPD property room for analysis. The shell casings were entered into the National Integrated Ballistic Information Network (NIBIN) and matched Crime Gun 773-23-005615. Crime Gun 773-23-005615 was not recovered and has yet to be recovered as of October 7, 2024. This brings the total shooting events to four (4).
- 13. On October 3, 2024, at approximately 0800 hours your affiant and TFO Jeffrey Kasza began conducting electronic surveillance at 2786 Citizens Place, Apt B., Columbus, Ohio 43232. The address was established through an investigative subpoena involving Charter Communications and cellphone records of MORRIS from Sinch Voice. This is also the address of the victim of the felonious assault, Mykayla Jackson.
- 14. On October 7, 2024, your affiant conducted electronic surveillance footage of 2786 Citizens Place, Apartment B., Columbus, Ohio, 43232. On October 3, 2024, at approximately 1927 hours, your affiant observed a male matching they physical appearance of MORRIS is observed exiting out of Apartment B with another unknown male. The male matching MORRIS's description was confirmed to be MORRIS by comparing the still image to MORRIS's current Ohio Bureau of Motor Vehicle (BMV) image, which was taken August 9, 2024. MORRIS locks the door for Apartment B with a key. At approximately 2006 hours, MORRIS returns to the residence with an unknown female and unlocks the door for Apartment B with a key.
- 15. On October 8, 2024, Columbus Division of Police (CPD) Special Weapons and Tactics (SWAT) conducted the arrest warrant for Michael MORRIS at 2786 Citizens Place, Apartment B. MORRIS was taken into custody without incident. The search of the residence revealed an AR "pistol". The AR pistol was loaded with a thirty (30) round magazine, with a round chambered, for a total of thirty-one (31) rounds. The AR pistol also had a brass catcher device affixed to the ejection port. DNA was taken from the firearm. Ammunition and one expended shell casing were also located at the residence.
- 16. Prior to SWAT's entry of the residence, the surveillance footage was reviewed by CGIC Investigators. The footage showed MORRIS possessing the AR pistol at approximately 0219 hours on October 8, 2024. MORRIS exited Apartment B. with the AR pistol in his right hand. At approximately 0220 hours, MORRIS re-entered Apartment B., still possessing the AR pistol in his right hand.
- 17. The search of the residence was conducted and the AR pistol was located in MORRIS's bedroom. The AR pistol was an Anderson Manufacturing AM-15 MULTI, serial number 20061073. The firearm contained a loaded thirty (30) round magazine, with a round chambered, for a total of thirty-one (31) rounds of ammunition.
- 18. MORRIS was incarcerated at the Franklin County Jail Jackson Pike Facility for his felonious assault warrant.

- 19. MORRIS was read his Miranda Rights and interviewed at the jail. MORRIS admitted to possessing the firearm, but stated he was not the owner of the firearm.
- 20. Special Agent Cole Benner examined the firearm and determine it was not manufactured in Ohio.
- 21. Based upon this information, your affiant believes probable cause exists that on the above date, in the Southern District of Ohio, MORRIS knowingly and intentionally possessed a firearm, in violation of 18 U.S.C.§ 922(g).

Terrence Vollmer, ATF Task Force Officer

Sworn before me and subscribe in my presence on this 5th day of February 2025, in Columbus, Ohio.

U.S. MAGISTRATE JUDGE

2/5/2025